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May 20, 2022

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, NY 10007

**Re: *Sjunde AP-Fonden v. The Goldman Sachs Group, Inc., et al.*, No. 1:18-cv-12084**

Dear Judge Broderick:

We represent Lead Plaintiff Sjunde AP-Fonden ("Lead Plaintiff") in the above-referenced matter. We write regarding Lead Plaintiff's Motion for Issuance of Hague Convention Letters of Request for International Judicial Assistance (the "Motion"), which seeks to obtain the testimony of three former employees of Defendant The Goldman Sachs Group, Inc. who are believed to be located in the United Kingdom. ECF Nos. 170-75. Lead Plaintiff filed its Motion on May 9, 2022.

The Parties have met and conferred regarding the Motion and the substance of the Letters of Request. Defendants represented that they would not oppose the Motion if Lead Plaintiff amended certain aspects of the Letters of Request. Lead Plaintiff has incorporated Defendants' requested amendments in the Letters of Request, which were filed via ECF earlier today. ECF Nos. 181-82. Accordingly, the previously filed Motion (ECF No. 171) is mooted by the instant Unopposed Motion (ECF No. 178). Lead Plaintiff respectfully requests that the Court grant the Unopposed Motion and issue the accompanying Letters of Request so that the requested testimony may be taken prior to the December 30, 2022 deadline for fact discovery.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

*S/ Andrew L. Zivitz*

Andrew L. Zivitz

cc: All Counsel of Record (via ECF)